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From:

**REC** Networks

To:

mbsecretary@fcc.gov, MMBS MMBSecretary, qualexint@aol.com

Date:

Thu, Dec 19,2002 11:55 PM

Subject:

02-376 - Table of Allotments (Sells, AZ)

REC filing electronic comments per Public Notice 01-345.



In the matter of MB Docket 02-376 (Sells, Arizona)

If there are any questions about this filing, please let me know.

A copy of this filing is also available for downloading at: http://akane.recnet.com/fcc/02-376.pdf

Thanks again!

REC Networks - http://w.recnet.com - Bringing you fun and culture since 1984. http://w.animehardcoreradio.net - Anime Hardcore Radio - 24 hour a day anime!

## Before The FEDERAL COMM UNICATI ONS COMMISSION WASHINGTON, D.C.

In the matter of	)	
	)	MB Docket 02-376
Am endm ent of §73.202 of the Comm ission's	)	RM-10617
Rules - Table of Allotm ents for FM	)	(Sells, Arizona)
Broadcast Stations	)	

## COMMENTS OF REC NETWORKS

- 1. REC Networks ("RE C") is a supporter of locally owned and diverse radio. REC currently operate's several internet only radio stations. REC also operates several websites including the original LPFM Channel Search Tool REC Networks also represents the interests of independently owned Low Power FM ("LPFM") broadcast stations and their listeners. Since the above captioned proceeding will have an impact on the future of local radio in REC's area of interest, REC will review the proposal and provide the results of our research, REC has no plans to apply far the channel REC should be considered an independent third pany
- 2 REC has reviewed the petition by Rural Pima Broadcastin g ("petition er") to amend the Table of Allotm ents to add Channel 285A to Sells, AZ.
- 3. Through an independent evaluation, we have found that Sells is a Census Designated Place with a 2000 Census of 2,799. Sells has it's awn police and fire departments. The Indian Oasis School District serves the community and there is also an extension of Pim a Community College Sells is also a government center of the very large Tohono Oodham Indian Nation. The community has an Assembly of God and a Baptis I church. Based an this information, REC feels that Sells meets the criteria to be a community for allotment purposes
- 4. Sells is well separated from any urbanized area and only receives city grade service from a non-comm erical educational FM KOHN(FM), which is actually operated by the Tohono Oodha m Nation. There are currently no commercial stations with city grade contours over Sells

5 Whenever REC evaluates an allotment we also evaluate the future of the LPFM service as a result of the allotment. This allotment in Sells does not displace any current LPFM stations or applications nor will the grant of this allotment prevent the future growth of the LPFM service in the Sells area or any areas that would be impacted by this allotment.

<sup>1</sup> Community	Current	Proposed
Sells. AZ		285A

Respectfully subm itted,

Rich Eyre for REC Networks

P O Box 40816

Mesa. AZ 85274-0816

rec@recn et.com www.recnet.cOm

## CERTIFICATE OF SERVICE

KEC has served a copy of these comments via US Mail upon the petition en

Scott C. Cinnam on Law Offices of Scott C. Cinnam on, PLLC 1090 Verm ont Ave., NW Suite 800, #144 Washington DC 20005

Electron ically filed with Corn ission at mmbsecretary@fcc.g ov per Public Notice 01-345

<sup>1 -</sup> REC's "Area of Interest" include the entire states of Arizona and Nevada as well as the Southern California counties of Kern, Los Angeles, Inyo, San Bernardino, Ventura, Riverside, Orange, San Diego and Imperial.

REC NETWORKS
ALLOTMENT EVALUATION

MB 02-376 RM-10617

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